

DECLARATION OF CLARA MOUSSA BOUSTANY

CLARA MOUSSA BOUSTANY declares and says, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a party to divorce proceedings initiated in Monaco by my husband, Fadi Boustany. I make this declaration in further support of my application for discovery in aid of that proceeding pursuant to 28 United States Code, Section 1782. The following is based upon my personal knowledge or, where indicated, upon information and belief.

The Boustany Foundation

2. I understand that in opposing this application, my husband asserts that there is no support for seeking bank records relating to the Boustany Foundation because there is no claimed connection between that foundation and my husband.

3. My husband's involvement in the Boustany Foundation is a matter of public record. <https://boustany-foundation.org/about-us/>. Since approximately 2009, the Boustany Foundation has funded, among other things, the Boustany Foundation/Harvard University MBA Scholarship, which is offered every two years to an international student admitted to the MBA program at Harvard Business School (<https://boustany-foundation.org/scholarship-programmes/mba-harvard/>).

4. I am informed and believe that my husband controls the Boustany Foundation, which is located in Monaco and Switzerland. I believe that the Boustany Foundation is funded by him, either directly or through affiliates such as the Metropole Group. As I mentioned in my declaration of June 6, 2023, "I am informed and believe that [my husband] controls — through his company — the Metropole group, which comprises a 5-star "palace" hotel (70% of which is indirectly owned by [my husband]) in the Golden Triangle in Monaco, an adjacent luxury

residence building, a parking facility with more than 130 spaces (each one costs €500,000), and a shopping center (40% of which is indirectly owned by [my husband] with approximately 80 shops and six restaurants.” (6/16/2023 Declaration of C. Moussa Boustany, ¶ 9.)

Solidere SAL

5. I also understand that my husband asserts that there is no support for seeking bank records relating to a company called Solidere SAL because there is no claimed connection between that company and him.

6. I am surprised that his counsel would call this into question. My husband’s involvement with Solidere SAL, a Lebanese joint-stock company, is also matter of public record. (<https://web.archive.org/web/20180305175143/http://solidere.com/corporate/about/board-directors> (Solidere Website a/o March 20, 2018, identifying Fadi Boustany as Vice Chair of the Board of the Directors: *Source* - www.waybackmachine.com)) Furthermore, I have already sought and obtained testimony and documents from a Solidere director pursuant to an order issued by Judge Oetken of this Court. See *In re Application of Clara Moussa Boustany*, SDNY Docket # 23-mc-00027 (JPO)(“Solidere Application”) at Dkt # 7. Notably, the very same firm (and attorney) who appeared on behalf of the Solidere director at his deposition is counsel of record for my husband in this proceeding (See *Solidere Application*, Dkt # 9 at 9)).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: Principality of Monaco
 January __, 2024
 1/18/2024

DocuSigned by:

Clara Boustany

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CLARA MOUSSA BOUSTANY